# ELLIOTT & ELLIOTT, P.A.

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September 30, 2020

# **VIA E-FILING**

Ms. Jocelyn D. Boyd Chief Clerk and Administrator South Carolina Public Service Commission 101 Executive Center Drive Columbia, SC 29210

RE:

Application of Dominion Energy South Carolina, Inc. for Adjustments in the

Company's Electric Rate Schedules and Tariffs

Docket No. 2020-125-E

Dear Ms. Boyd:

Enclosed please find for filing the Petition to Intervene on behalf of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record.

If you have questions, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT, P.A.

Scott Elliott

SE/lbk Enclosures

cc:

All parties of record (w/encl.)

### STATE OF SOUTH CAROLINA

# BEFORE THE PUBLIC SERVICE COMMISSION

#### **DOCKET NO. 2020-125-E**

| IN THE MATTER OF:                        | ) |                       |
|------------------------------------------|---|-----------------------|
|                                          | ) |                       |
| Application of Dominion Energy South     | ) |                       |
| Carolina, Incorporated For Adjustments   | ) | PETITION TO INTERVENE |
| in the Company's Electric Rate Schedules | ) |                       |
| and Tariffs                              | ) |                       |

The South Carolina Energy Users Committee ("SCEUC") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to R.103-836 of the Commission's rules and regulations to intervene and to be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:

- 1. That on August 14, 2020, Dominion Energy South Carolina, Inc. ("DESC" or "Company") filed an application with the Commission pursuant to S.C. Cod Ann. §§ 788-27-820, 58-27-860, 58-27-870 (2015, as amended), Commission Regulation 103-823 (2012) and other applicable laws and rules seeking, *inter alia*, authority to adjust, change and increase its retail electric rates, charges and tariffs which, according to the application, would increase annual revenues by approximately 7.75% or \$178 million.
- 2. That SCEUC is an association organized in the State of South Carolina, consisting of large industrial consumers of energy which are engaged in various manufacturing enterprises throughout the State; SCEUC is organized for the purposes of

intervening and participating in regulatory proceedings to advocate for cost based electric rates that are just and reasonable.

- 3. That members of SCEUC take electric service from DESC, consuming and purchasing substantial amounts of electricity from the Company.
- 4. That SCEUC and its members have a real, material and substantial interest in the subject matter to be addressed and resolved by the Commission in this docket as SCEUC members will suffer an adverse impact if obligated for payment of increased electric rates, charges and tariffs; as a consequence, SCEUC's members will be aggrieved by an order by the Commission adjusting, changing and increasing DESC's electric rates, charges and tariffs.
- 5. That the interests of SCEUC's members are not adequately represented by the current parties to this proceeding.
- 6. That given the state of the record at this stage of the proceedings, SCEUC lacks sufficient information to fully develop and state its position in this proceeding at this time.
- 7. That granting SCEUC's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns can be developed.
- 8. That in accordance with Rule R. 103-804 (S) of the Commission's Rules of Practice and Procedure, Petitioner is represented by counsel in this proceeding:

Scott Elliott, Esquire Elliott & Elliott, P.A. 1508 Lady Street Columbia, South Carolina 29201 Telephone: 803-771-0555

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# WHEREFORE, Petitioner prays for the following relief:

- a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- b. That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and

c. For such other and further relief as is just and proper.

Scott Elliott, Esquire ELLIOTT & ELLIOTT, P.A. 1508 Lady Street Columbia, S.C. 29201 (803) 771-0555 selliott@elliottlaw.us

Attorney for the South Carolina Energy Users Committee

Columbia, South Carolina September 30, 2020

### CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: Application of Dominion Energy South Carolina, Inc. for

Adjustments in the Company's Electric Rate Schedules and

**Tariffs** 

DOCKET NO.: 2020-125-E

PARTIES SERVED: <u>Via Electronic and U.S. Mail</u>

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PLEADING:

Petition to Intervene

September 30, 2020

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